

From: [Gary Moore](#)
To: [Stephen Halasz](#)
Cc: [Gloria-Small Moran](#); [Rafael Casanova](#); [Walt Helmick](#)
Subject: Comments on Removal Workplans
Date: 07/09/2004 02:25 PM

Steve:

The following are my comments to your Removal Workplans. They are really very minor.

General Comment:

You are required to have a Quality Management Plan and submit it in for review. This is not necessarily required for what you will be doing under the removal unless you will be doing assessment type sampling. I know it will be required under the Remedial activities. I suggest that you call Rafael relative to this and he can get with our Quality Assurance person, Walt Helmick.

Removal Action Workplan:

1. Page 10, Section 3.4: "Also included is the emergency response plan, which includes:
Comment: I think where it says emergency response plan you meant HSP.
2. Page 11, Section 3.5: I believe that you are required to have a 3rd party to monitor air quality when doing asbestos abatement. You should probably change from may to will.
3. Page 14, Section 3.7: You need to GPS all locations where you will be conducting excavations of visually contaminated soils, you should take a photograph of pre and post excavation. I also think you should at a minimum do some type of field screening with a hapsite or PID/FID. You may want to pull a sample as well. In addition, you should probably GPS the location of any tanks that are being removed or have been removed recently.

Safety and Health Plan

1. Page 7, Section 10.4: "When measurements with a CGI indicate the presence exceeding the explosively action level " Comment: change explosively to explosive.
2. Page 11, Section 15.5: When the fire department, state and/or federal regulatory agents arrive , the command, control, and responsibility for the site MAY be assumed by that entity.
3. Appendix E: The EPA Region 6, 24-hr number is 866-372-7745. FYI: If you contact the NRC, EPA Region 6 gets a direct call from the NRC. Also, you can request to speak to the EPA duty officer.

If you have any questions, please give me a call. I can also be reached on my cell at 214.789.1627

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